

FILED

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION

DEC 29 2004
ARLEN E. BOYLE CLERK
By *[Signature]* Deputy

UNITED STATES OF AMERICA,
ex rel., THOMAS F. JAMISON

PLAINTIFF

V.

CIVIL ACTION NO. 2 : 0 4 C V 3 5 5 - P - B

BEVERLY OF TUPELO, BEVERLY OF
CLEVELAND, BEVERLY OF SOUTHAVEN,
BEVERLY OF GRENADA, BEVERLY OF
INGLEWOOD, BEVERLY OF MANHATTAN,
BEVERLY OF NORTHWEST, BEVERLY OF
BROADMOOR,, BEVERLY OF BROOKHAVEN,
BEVERLY OF AMORY, BEVERLY OF
BATESVILLE, BEVERLY OF SOUTHWEST,
BEVERLY OF CROSSGATES, BEVERLY OF
RULEVILLE, BEVERLY OF RIPLEY, BEVERLY
OF TYLERTOWN, BEVERLY OF EUPORA,
BEVERLY ENTERPRISES, DAVID BANKS,
OXFORD MANAGEMENT COMPANY, INC.,
HATTIESBURG CONVALESCENT, JEWEL
MCMAHAN, RAY MEDICAL, MARTHA
MCMAHAN, GARY MCMAHAN, P R N
DEVICES, INC., H.W. WEEKS, OTIS ALLEN,
T.A. BARRENTINE, THOMAS HILL, GOLDEN
AGE, INC., JASPER COUNTY NURSING
HOME, JASPER COUNTY, MARSHALL POSEY,
JASPER GENERAL HOSPITAL, ROBERT JONES,
YALOBUSHA COUNTY NURSING HOME,
YALOBUSHA COUNTY, YALOBUSHA
GENERAL HOSPITAL, M-D MEDICAL
SERVICES, INC., COMPERE'S NURSING
HOME, HUGH FRANKLIN, FRANKLIN NURSING
CENTERS, ANCILLARY INVENTORY
MANAGEMENT SERVICES, INC., PLUMPOINT
CHRISTIAN CENTER, CHRIS PLUMLEE, DEBBIE
PLUMLEE, QUEEN CITY NURSING CENTER,
MIKE HOWARD, BARBARA HOWARD, CURTIS
SOFTWARE, QUEST MEDICAL SERVICES, INC.,
TED CAIN, HOTEL REED NURSING CENTER,
WOODLAND VILLAGE NURSING CENTER, MS
CARE CENTER OF GREENVILLE, MIKE

OVERSTREET, MS CARE CENTER OF
MORTON, MS CARE CENTER OF DEKALB,
GRACELAND CARE CENTER OF OXFORD,
LARRY OVERSTREET, GRACELAND
MANAGEMENT CO. INC., GRACELAND
CARE CENTER OF PONTOTOC, GRACELAND
CARE CENTER OF NEW ALBANY, TROY
GRIFFIN, BENNY HUBBARD, PINE CREST
GUEST HOME, RON GUINS, PROVIDER
CARE, INC., MEADVILLE CONVALESCENT
HOME, CLAIBORNE COUNTY NURSING
CENTER, BRUCE KELLY, RANDOLPH
TILLMAN, LEXINGTON MANOR, BILLDORA,
INC., SENIOR LIVING ANCILLARY SERVICES
OF PORT GIBSON, SENIOR LIVING ANCILLARY
SERVICES OF LEXINGTON, SENIOR LIVING
ANCILLARY SERVICES OF TYLERTOWN,
SENIOR LIVING ANCILLARY SERVICES OF
CENTERVILLE, SENIOR LIVING ANCILLARY
SERVICES OF JACKSON, SENIOR LIVING
ANCILLARY SERVICES OF JACKSON, SENIOR
LIVING ANCILLARY SERVICES OF JACKSON,
WILKINSON COUNTY NURSING CENTER,
HINDS COUNTY NURSING AND
REHABILITATION CENTER, MAGNOLIA
NURSING CENTER, BELHAVEN NURSING
CENTER, BROOKWOOD MANOR NURSING
CENTER, HAROLD BEEBE, STEVE
DELANEY, BECKY SHELTON, DELCO, INC.,
GERIATRIC SERVICES, INC., ROYCE DELANEY,
GLEN OAKS NURSING CENTER, CLARKSDALE
NURSING CENTER, MAGNOLIA
MANAGEMENT, FOREST HILL NURSING
CENTER, A.D. BUFFINGTON, HILLCREST
NURSING CENTER, THE MYRTLES HEALTH
CARE FACILITIES, LEGACY HEALTH CARE,
ARNOLD AVENUE NURSING HOME, RICHARD
T. DASPIT, FOUNDATION HEALTH SERVICES,
PREMIER MARKETING ASSOCIATES, LTD./MS,
PREMIER MARKETING ASSOCIATES, AUTUMN
LEAVES NURSING HOME, HAVEN HALL
HEALTHCARE CENTER, PEMBERTON MANOR,
BRIAR CREST EXTENDED CARE, VANGUARD
HEALTHCARE, WILLIAM ORAND, RICHARD

WAGNER, JERRY ERVIN, TOTAL ANCILLARY SERVICES, REST HAVEN NURSING HOME, SHADY LAWN NURSING HOME, VICKSBURG CONVALESCENT, AURORA AUSTRALIS LODGE, THE NICHOLS CENTER, LARRY FORTENBERRY, LARRY RUSSELL, SOUTHERN HEALTHCARE ASSOCIATION, MEDICAL PLUS, LLC, VINEYARD COURT NURSING CENTER, WILLOW CREEK RETIREMENT CENTER, JONES COUNTY REST HOME, THE CARRINGTON NURSING CENTER, SHELBY NURSING & REHAB CENTER, SCOTT BELL, W.E. TREHERN, DELTA HEALTH GROUP, INC., SKYLER, INC., LAKESIDE LIVING CENTER, GREENBOUGH NURSING CENTER, THE BOYINGTON NURSING CENTER, DIXIE WHITE HOUSE NURSING HOME, MIRAMAR LODGE NURSING HOME, SINGING RIVER REHAB & NURSING HOME, OCEAN SPRINGS NURSING CENTER, RIVER CHASE VILLAGE, SENTRYCARE, INC., CHRIS CHEEK, ROBERT GODDARD, HARRY STROHM, DUNBAR VILLAGE TERRACE, VAIDEN COMMUNITY LIVING CENTER, DOUG WRIGHT, SR., DOUG WRIGHT, JR., RIGHTCARE, INC., COMMUNITY ELDER CARE SERVICES, RIGHTCARE MEDICAL, INC., PROCLAIM, INC./ PROCLAIM AMS, WEST POINT COMMUNITY LIVING CENTER, BILOXI COMMUNITY LIVING CENTER, PLEASANT HILLS NURSING CENTER, COURTYARDS COMMUNITY LIVING CENTER, PLAZA COMMUNITY LIVING CENTER, SUNPLEX SUBACUTE CENTER, LAURELWOOD COMMUNITY LIVING CENTER, MERIDIAN COMMUNITY LIVING CENTER, TISHOMINGO COMMUNITY LIVING CENTER, PIKE COMMUNITY CARE CENTER, LONGWOOD COMMUNITY LIVING CENTER, ADAMS COUNTY NURSING CENTER, ELTON BEEBE, KEN BEEBE, PREMIER MARKETING ASSOCIATES LTD., CHARLES GRAY, GLYNN BEEBE, TRACY BEEBE, ATTALA COUNTY NURSING CENTER, COVINGTON COUNTY NURSING CENTER, LEGACY MANOR NURSING

& REHAB, HERITAGE HOUSE NURSING CENTER, HUMPHREYS COUNTY NURSING CENTER, LAWRENCE COUNTY NURSING CENTER, PERRY COUNTY NURSING CENTER, HERITAGE MANOR ROLLING FORK, SARDIS COMMUNITY NURSING CENTER, TISHOMINGO MANOR, BRANDON COURT, BOBBY BEEBE, MCCOMB NURSING & REHAB, COPIAH LIVING CENTER, GRENADA LIVING CENTER, HIGHLAND HOME, LANDMARK OF DESOTO, WINDHAM HOUSE OF HATTIESBURG, GLENBURNIE NURSING HOME, DAVID R. WILSON, BRIAN GRAZZINI, CENTENNIAL HEALTHCARE, CENTENNIAL PROFESSIONAL THERAPY SERVICES CORPORATION, MCCOMB EXTENDED CARE, STARKVILLE MANOR, HILLTOP MANOR NURSING HOME, RILEY NURSING CENTER, WINONA MANOR, COUNTRYBROOK, MARINER FOUNDATION, TERRY O'MALLEY, MARINER HEALTH CARE, CHRISTIAN WINKLE, BOYD P. GENTRY, MARINER MEDICAL SUPPLY, INC., BOLIVAR HEALTH & REHAB CENTER., CLINTON HEALTH & REHAB. CENTER, COLUMBIA HEALTH & REHAB. CENTER, CORINTH HEALTH & REHAB CENTER, GREENWOOD HEALTH & REHAB., GRENADA HEALTH & REHAB CENTER, HOLLY SPRINGS HEALTH & REHAB CENTER, INDIANOLA HEALTH & REHAB CENTER, TRACE HAVEN HEALTH & REHAB CENTER, CARE CENTER OF CLINTON, JOHN W. JAMISON, CARECORPS, INC., CARE CENTER OF ABERDEEN, CARE CENTER OF LOUISVILLE, CARE CENTER OF LAUREL, CONVA-REST OF HATTIESBURG, CONVA-REST OF HATTIESBURG, CONVA-REST OF PETAL, CONVA-REST OF NEWTON, CONVA-REST OF MENDENHALL, MIKE MCELROY, HMP NURSING SERVICES, INC., BEDFORD CARE OF MONROE HALL, BEDFORD CARE CENTER OF HATTISBURG, BEDFORD CARE CENTER OF PETAL, BEDFORD CARE CENTER OF NEWTON, BEDFORD CARE CENTER OF MENDENHALL,

UNICARE RX, INC.,
KATIE MAE OVERSTREET, HEALTHCARE
CONSULTANTS, ALCORN REHAB &
HEALTHCARE CENTER, ADVANCED
HEALTHCARE MANAGEMENT, LTD., BENNY
HUBBARD, HTC HEALTHCARE, DR. JOHN
SUTTER, SENIOR LIVING CENTERS, INC.,
MASTERCARE, INC., MEDICAL SOLUTIONS,
INC., ALLIANCE CONGLOMERATE GROUP,
LLC., GULF SOUTH MEDICAL SUPPLY,
TURENNE PHARMEDCO, INC., OMNI HEALTH
CARE, INC., OMNI HEALTHCARE PHARMACY,
INC., RED LINE MEDICAL SUPPLY, INC.,
MEDNET/DME BILLING SERVICES, INC.,
MEDLINE INDUSTRIES, INC.. MICHAEL A.
YANT, PSS WORLD MEDICAL, ROGER
TURENNE, RON SHERRILL, NOVARTIS, INC.,
MCKESSON-HBOC, JEFF BIERMAN, OAK
GROVE RETIREMENT, CHARLES E. SMITH,
CAROL F. SMITH, RED LINE HEALTHCARE,
NORTH MISSISSIPPI MEDICAL CENTER OF
BALDWIN, NORTH MISSISSIPPI MEDICAL
CENTER, PONTOTOC NURSING HOME,
WEBSTER HEALTH FACILITY, RIVER
OAKS CONVALESCENT CENTER,
BRUCE NURSING CENTER, TRUCARE
MEDICAL, SERVICEMASTER DIVERSIFIED
HEALTH SERVICES, INC., THE HEALTH CARE
ADVISORY GROUP, INC., SPECIALIZED
MANAGEMENT, INC., CONNER CAIN, BRIAN
CAIN, AVONNA CAIN, LAKEVIEW
CORPORATION, DRIFTWOOD NURSING
CENTER, AZALEA GARDENS NURSING
CENTER, STONE COUNTY HOSPITAL, SKY
BLUE, INC., FLORIDA HEALTH CARE
PARTNERSHIP, LTD, MAGNOLIA ELDERCARE,
INC., DR. JOHN SUTER, A.T. SUTER, PINE LAKE
NURSING HOME, LP, BLUEBIRD SUPPLY, INC.,
REMINGTON FINANCIAL SOLUTIONS, INC.,
STEIN AND ASSOCIATES, PAUL STEIN, JAMES
STEIN, FORMULATED HEALTH CARE
SERVICES, PROFESSIONAL HEALTHCARE,
FORMULATED THERAPY, DONNA ZUMWALT,
DEBBIE FORTENBERRY, COMMUNITY CARE

CENTER, MAGNOLIA HEALTHCARE, INC., G. STUART MURPHY, III, LOUIS HERRERO, THOMAS J. ECHOLS, SAM MOTTESHEARD, ORTHOTICS, INC., MILLENNIUM MEDICAL, LLC, PAM BEEBE GRAY, SAMUEL MAHFOUZ, ANDREA FULLER, JOHN W. JAMISON, CARE CENTER OF OPELIKA, CARE CENTER OF RED BAY, CARE CENTER OF VERNON, JERNIGAN HEALTHCARE, INC., MICHAEL MCELROY, JR., JANET MCELROY, STEPHEN WORRELL, CONVA-REST OF NORTHGATE, GEORGE HOLZHAUER, STEVE MARTIN, TOM I. DAVIS, SUZANNA BAKER, MARK ROSENBERG, CHARLES BURNHAM, MISSISSIPPI STATE VETERANS HOME/COLLINS, MISSISSIPPI STATE VETERANS HOME/JACKSON, MISSISSIPPI STATE VETERANS HOME/KOSCIUSKO, MISSISSIPPI STATE VETERANS HOME/OXFORD, BOND JOHNSON & BOND, COVENANT DOVE, INC., BOND, INC., CLINTON PARTNER'S, INC., CARE INNS, INC., WILLIAM W. BOND, III, WILLIAM W. BOND, JR., MADONNA BOND, GEORGE T. JOHNSON, JERRY D. MOONEY, JUDY ULLERY, SUSAN SAIN, JOHN CALVASINA, TRINITY MISSION OF CLINTON, TRINITY MISSION OF HOLLY SPRINGS, VICKSBURG TRACE HAVEN, PICAYUNE CONVALESCENT CENTER, MID-DELTA HOME HEALTH, INC., MID-DELTA HEALTH SYSTEMS, INC., MID-DELTA HEALTH SERVICES, INC, CLARA REED, HENRY REED, PAMELA R. REDD, MID-DELTA HOME HEALTH, INC., MID-DELTA HOSPICE, MID-DELTA DURABLE MEDICAL, CERES STRATEGIES, THE WAVERLY GROUP, BOBBY R. ARNOLD, JOHN L. BLACK, JR., CHAUNCEY R. DUNBAR, SUSAN BROWN, WAVERLY HEALTH CARE CONSULTANTS, INC., TURRENE & ASSOCIATES, WALLACE SCHMIDT HEALTHCARE MANAGEMENT CO., INC., ROGER TURENNE, PATTI WALLACE TURENNE, CHRISTOPHER SCHMIDT, ALBERTVILLE HEALTH CENTER, CAPITAL HILL HEALTH CENTER, HILLVIEW TERRACE, TALLADEGA

HEALTH CENTER, WESTSIDE TERRACE, DAVID MCCAY, SUE POTOSKY, ANDY EDWARDS, STACEY HAMMOND, DESOTO HEALTHCARE CENTER, QUITMAN COUNTY NURSING HOME, TUNICA NURSING HOME, CHOCTAW COUNTY NURSING HOME, DUGAN MEMORIAL HOME, TRINITY HEALTHCARE CENTER, BENCHMARK NURSING HOME, BRIAR HILL REST HOME, BRENT TICE, STRATEGIC HEALTHCARE, DR. RICHARD WALLER, SYLVIA SANDERS, PATRICIA YATES, CHOCTAW COUNTY, MISSISSIPPI STATE VETERANS AFFAIRS, MISSISSIPPI METHODIST FOUNDATION, GUY HOWARD, PAULETTE BUTLER, RIVER PLACE NURSING CENTER, ANN SKINNER, DON SKINNER, ROSS KOONS, BOLIVAR MEDICAL CENTER LTC FACILITY, FLOY DYER MANOR, SHEARER RICHARDSON MEMORIAL HOME, CEDARS HEALTH CENTER, COMMUNITY NURSING HOME, KAREN SELESTAK, DERWOOD BOYLES, BLANCHE REED, ROLLING HILLS DEVELOPMENT CENTER, AGAPE MEDICAL SERVICES, ANTHONY WILLIS, JEFFERSON COUNTY NURSING HOME, JEFFERSON COUNTY, MED-SOUTH, INC., PHILLIP HUDSON, JOSEPH PATTERSON, PRENTISS REGIONAL HOSPITAL ECF, WINSTON COUNTY NURSING HOME, ERIC JORDAN, DALE SAULTERS, APRIA HEALTHCARE, MIKE SIMON, NESTLE', JAMES JERNIGAN, JON F. BRAKEFIELD, MICHELLE BRAKEFIELD, DAVID GAMBLE, DON SMITH, SENATOBIA CONVALESCENT CENTER, DENVER NORTHRIP, THOMPSON COMPANY, INC., BRUCE THOMPSON, BILLY RAY CLEMONS, FOREST REYNOLDS, JOEY CAMPO, JEFF JEFFRIES, JASON ORMOND, XVIII B MEDI MART, and MEDINET BILLING

DEFENDANTS

FILED UNDER SEAL

COMPLAINT
(JURY TRIAL REQUESTED)

Qui tam relator, Thomas F. Jamison, by his undersigned attorney, hereby alleges as follows:

1. This is a civil action brought on behalf of the United States of America against Defendants to recover damages and civil penalties under the False Claims Act, 31 U.S.C. §§ 3729-3732, as amended by the False Claims Act Amendments of 1986. Relator Thomas F. Jamison ("Jamison"), acting on behalf of the United States, brings this civil action under the qui tam provisions of the False Claims Act.

Venue and Jurisdiction

2. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1345 and 31 U.S.C. §§ 3730(b) and 3732(a).

3. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b) and (c) and 31 U.S.C. § 3732(a). Certain of the defendants resided in this district and/or were doing business in this district at all times material to this action. Certain of the claims set forth in this Complaint arose in this district.

The Parties

10. Qui tam plaintiff Jamison is a United States citizen and a resident of the State of Mississippi. Jamison has worked in the durable medical equipment industry since 1994.

11. Oxford Management Company, Inc. is located at 2154 South Lamar Boulevard, Oxford, Mississippi, 38655, and can be served by its registered agent, Michael H. Overstreet, 2154 South Lamar Boulevard, Oxford, Mississippi, 38655.

12. Defendant Hattiesburg Convalescent is located at 514 Bay Street, Hattiesburg,

Mississippi, 39041, and can be served by its registered agent Jewell C. McMahan, 2309 Carriage Road, Hattiesburg, Mississippi, 39401.

13. Jewell C. McMahan is an adult resident of Forest County, Mississippi, and can be served at 2309 Carriage Road, Hattiesburg, Mississippi, 39401, and is an officer and/or owner of Hattiesburg Convalescent.

14. Ray Medical is located at 210 Hinds Boulevard, Raymond, Mississippi 39154.

15. Martha McMahan is an officer and/or owner of Ray Medical.

16. Gary McMahan is an officer and/or owner of Ray Medical.

17. P R N Devices, Inc. is located at 210 Hinds Boulevard, Raymond, Mississippi, and can be served by its registered agent Donald W. Skinner, 12 Lakeview Drive, Raymond, Mississippi, 39154.

18. H.W. Weeks is an officer and/or owner of Golden Age, Inc.

19. Otis Allen is one of the owners of Golden Age, Inc.

20. T.A. Barrentine is an officer and/or owner of Golden Age, Inc.

21. Thomas Hill is one of the Administrators at Golden Age, Inc.

22. Golden Age, Inc. is located at 2901 Highway 82 East, Greenwood, Mississippi, 38930.

23. Jasper County Nursing Home is located at 15 South 6th Street, Bay Springs, Mississippi, 39422.

24. Jasper County

25. Marshall Posey is an administrator at Jasper County Nursing Home.

26. Jasper General Hospital is located at 15 South 6th Street, Bay Springs, Mississippi,

39422.

27. Yalobusha County Nursing Home is located at Highway 7 South, Water Valley, Mississippi, 38965.

28. Yalobusha County

29. Yalobusha General Hospital is located at Highway 7 South, Water Valley, Mississippi, 38965.

30. Robert Jones is an administrator at Yalobusha General Hospital.

31. M-D Medical Services, Inc. is located at 104 Avalon Court, Jackson, Mississippi, and can be served by its registered agent, David A. McCay, 104 Avalon Centre #E, Brandon, Mississippi.

32. Compere's Nursing Home is located at 865 North Street, Jackson, Mississippi, 39202, and can be served by its registered agent, William C. Rhodes, 9909 Highway 59, Vancleave, Mississippi, 39565.

33. Hugh Franklin is an adult resident of Calhoun County, Mississippi. He can be served at Highway 9 South, Bruce, Mississippi, 38915, and is an officer and/or owner of Compere's Nursing Home, Forest Hill Nursing Center, and Bruce Nursing Center.

34. Franklin Nursing Centers is located at 865 North Street, Jackson, Mississippi, 39202, and can be served by its registered agent Christopher S. Plumlee, 865 North Street, Jackson, Mississippi, 39202.

35. Ancillary Inventory Management Services, Inc. is located at 7282 Plantation Road, Suite 102, Pensacola, Florida, 32504. It can be served by its registered agent, Jon F. Brakefield, 325 Man-O-War Circle, Cantonment, Florida, 32533.

36. Plumpoint Christian Center is located at 865 North Street, Jackson, Mississippi, 39202, and can be served by its registered agent, Christopher S. Plumlee, 865 North Street, Jackson, Mississippi, 39202.

37. Chris Plumlee is an adult resident of DeSoto County, Mississippi, and is an officer and/or owner of Plumpointe Christian Center.

38. Debbie Plumlee is an adult resident of DeSoto County, Mississippi, and is an officer and/or owner of Plumpointe Christian Center.

39. Queen City Nursing Center is located at 1201 28th Avenue, Meridian, Mississippi, 39301, and can be served by its registered agent, Michael Howard at 1201 28th Avenue, Meridian, Mississippi, 39301.

40. Mike Howard is an officer and/or owner of Queen City Nursing Center.

41. Barbara Howard is an officer and/or owner of Queen City Nursing Center.

42. Curtis Software is an Ohio Corporation located in Summit County, Ohio, and can be served by its registered agent, Terry Hollister, at 1 Cascade Plaza, Suite 1220, Akron, Ohio, 44308.

43. Quest Medical Services, Inc. is located in Wiggins, Mississippi, and can be served by its registered agent at 146 West Pine Avenue, Wiggins, Mississippi, 39577.

44. Ted Cain is an officer and/or owner of Hotel Reed Nursing Center, Woodland Village Nursing Center, HTC Healthcare, Quest Medical Services, Inc., and Stone County Hospital.

45. Hotel Reed Nursing Center is a Limited Liability Company and can be served by its registered agent, Harold T. Cain, at 146 West Pine Avenue, Wiggins, Mississippi, 39577.

46. Woodland Village Nursing Center is located at 146 West Pine Avenue, Wiggins, Mississippi, and can be served by its registered agent, Harold T. Cain, 146 West Pine Avenue, Wiggins, Mississippi, 39577.

47. MS Care Center of Greenville is a Limited Liability Company, and can be served by its registered agent, Oxford Management Company, 921 Van Buren Avenue, Oxford, Mississippi, 38655.

48. Mike Overstreet is an adult resident of Lafayette County, Mississippi, and can be served at 2154 South Lamar Boulevard, Oxford, Mississippi, 38655, and is an officer and/or owner of Mississippi Care Center of Greenville, Mississippi Care Center of Morton, Mississippi Care Center of DeKalb, Oxford Management Company, Inc., and Alcorn Rehabilitation & Healthcare Center.

49. MS Care Center of Morton is a Limited Liability Company, and can be served by its registered agent, Oxford Management Co, 2154 South Lamar Boulevard, Oxford, Mississippi.

50. Mississippi Care Center of DeKalb is a Limited Liability Company, and can be served by its registered agent, Oxford Management Co., 921 Van Buren Avenue, Oxford, Mississippi, 38655.

51. Graceland Care Center of Oxford is a Limited Liability Company and can be served by its registered agent, Graceland Management Company, Inc., 1303 Belk Boulevard, Oxford, Mississippi, 38655.

52. Larry Overstreet is an adult citizen of Lafayette County, and can be served at 801 South 16th Street, Oxford, Mississippi, 38655, and is an officer and/or owner of Graceland Care Center of Oxford, Graceland Care Center of Pontotoc, Graceland Care Center of New Albany,

and Graceland Management Company, Inc.

53. Graceland Management Company, Inc. is located at 1300 Belk Boulevard, Oxford, Mississippi, 38655, and can be served by its registered agent, W. Larry Overstreet, 1303 Belk Boulevard, Oxford, Mississippi, 38655.

54. Graceland Care Center of Pontotoc is a Limited Liability Company and can be served by its registered agent, Graceland Management Co., Inc., 1303 Belk Boulevard, Oxford, Mississippi.

55. Graceland Care Center of New Albany is a Limited Liability Company and can be served by its registered agent, Graceland Management Co., Inc., 1303 Belk Boulevard, Oxford, Mississippi.

56. Troy Griffin is an officer and/or owner of Advanced Healthcare Management, Inc.

57. Benny Hubbard is an officer and/or owner of Advanced Healthcare Management, Inc.

58. Pine Crest Guest Home can be served by its registered agent, R.W. Schmidt, 4800 McWillie Drive, Jackson, Mississippi, 39206.

59. Ron Guins is an officer and/or owner of Pine Crest Guest Home, MasterCare, Inc., Provider Care, Inc., Meadville Convalescent Home, and MasterCare, Inc.

60. Provider care, Inc. is a Louisiana Corporation located at 7505 Pines Road, Suite 1190, Shreveport, Louisiana, 71129, and can be served by its registered agent, Steven E. Adams, 7505 Pines Road, Suite 1190, Shreveport Louisiana, 71129.

61. Meadville Convalescent Home is located at 814 Main Street #301, Columbia, Mississippi 39429, and can be served by its registered agent, Maurice Dantin, 814 Main Street #301, Columbia, Mississippi, 39429.

62. Claiborne County Nursing Center is located in Port Gibson, Mississippi, and can be served by its registered agent, R. Kent Hudson, RR1 Old Highway 61, Port Gibson, Mississippi, 39150.

63. Randolph Tillman is an officer and/or owner of Claiborne County Nursing Center, Lexington Manor, Senior Living Centers, Inc., Billdora, Inc, Senior Living Ancillary Services of Port Gibson, Senior Living Ancillary Services of Lexington, Senior Living Ancillary Services of Tylertown, Senior Living Ancillary Services of Centerville, Senior Living Ancillary Services on Albermarle Road in Jackson, Senior Living Ancillary Services on North State Street in Jackson, Senior Living Ancillary Services on Peter Quinn Drive in Jackson, Lexington Manor, Wilkinson County Nursing Center, Hinds County Nursing and Rehabilitation Center, Magnolia Nursing Center, and Belhaven Nursing Center.

64. Bruce Kelly is an officer and/or owner of Claiborne County Nursing Center, Lexington Manor, Senior Living Centers, Inc., Billdora, Inc, Senior Living Ancillary Services of Port Gibson, Senior Living Ancillary Services of Lexington, Senior Living Ancillary Services of Tylertown, Senior Living Ancillary Services of Centerville, Senior Living Ancillary Services on Albermarle Road in Jackson, Senior Living Ancillary Services on North State Street in Jackson, Senior Living Ancillary Services on Peter Quinn Drive in Jackson, Lexington Manor, Wilkinson County Nursing Center, Hinds County Nursing and Rehabilitation Center, Magnolia Nursing Center, and Belhaven Nursing Center.

65. Lexington Manor is located at 300 South Commerce Street, Natchez, Mississippi, 39120 and can be served by its registered agent, Ann Combs Tillman, 320 South Commerce Street, Natchez, Mississippi, 39120.

66. Billdora, Inc. is located at 314 Enoch Street, Tylertown, Mississippi, 38655, and can be served by its registered agent, John K. Gresham, Jr., 6360 I-55 North #405, Jackson, Mississippi, 39211.

67. Senior Living Ancillary Services in Port Gibson located at 2124 Old Highway 61 South, Port Gibson, Mississippi, 39150, is a Limited Liability Company, and can be served by its registered agent, Charles Bruce Kelly, 321 Main Street, Natchez, Mississippi, 39120.

68. Senior Living Ancillary Services in Lexington is located at 56 Rockport Road, Lexington, Mississippi, 39095.

69. Senior Living Ancillary Services in Tylertown is located at 314 Enoch Street, Tylertown, Mississippi, 39667.

70. Senior Living Ancillary Services in Centerville is located at 116 South Lafayette Street, Centerville, Mississippi, 39631.

71. Senior Living Ancillary Services in Jackson is located at 3454 Albermarle Road, Jackson, Mississippi, 39213

72. Senior Living Ancillary Services in Jackson is located at 3701 Peter Quinn Drive, Jackson, Mississippi, 39213.

73. Senior Living Ancillary Services in Jackson is located at 1004 North State Street, Jackson, Mississippi, 39202.

74. Wilkinson County Nursing Center is a Limited Liability Company and can be served by its registered agent, R. Kent Hudson, 320 Main Street, Natchez, Mississippi, 39120.

75. Hinds County Nursing and Rehabilitation Center is a Limited Liability Company and may be served by its registered agent C. Bruce Kelly, 10 Colony Drive, Natchez, Mississippi,

39120.

76. Magnolia Nursing Center is located at 3701 Peter Quinn Drive, Jackson, Mississippi,

39213.

77. Belhaven Nursing Home is a Limited Liability Company and can be served by its registered agent, R. Kent Hudson, 320 Main Street, Natchez, Mississippi, 39120.

78. Brookwood Manor Nursing Center is located on McLeod Avenue in Leakesville, Mississippi, 39451.

79. Harold Beebe is an adult resident of Madison County, Mississippi, and can be served at 227 Coachmans Road, Madison, Mississippi, 39110, and is an officer and/or owner of Brookwood Manor Nursing Center, Delco, Inc., Glen Oaks Nursing Center, Clarksdale Nursing Center, Hillcrest Nursing Center, and The Myrtles Health Care Facilities.

80. Steve Delaney is an officer and/or owner of Brookwood Manor Nursing Center, Delco, Inc., Glen Oaks Nursing Center, Clarksdale Nursing Center, Hillcrest Nursing Center, The Myrtles Health Care Facilities, and Geriatric Services, Inc.

81. Becky Shelton is an officer and/or owner of Brookwood Manor Nursing Center, Delco, Inc., Glen Oaks Nursing Center, Clarksdale Nursing Center, Hillcrest Nursing Center, and The Myrtles Health Care Facilities, and Geriatric Services, Inc.

82. Delco, Inc. can be served by its registered agent, Harold M. Beebe, 14 Northtown Drive, Suite 202, Jackson, Mississippi, 39211.

83. Geriatric Services, Inc. is located at 14 Northtown Drive, Jackson, Mississippi, 39211, and can be served by its registered agent, Steve Delaney, 14 Northtown Drive #202, Jackson, Mississippi, 39211.

84. Royce Delaney is an adult resident of Rankin County, Mississippi, and can be served at 553 Rusk Drive, Brandon, Mississippi, 39047, and is an officer and/or owner of Geriatric Services, Inc.

85. Glen Oaks Nursing Center is located at 55 Suzanne Street, Lucedale, Mississippi, 39452.

86. Clarksdale Nursing Center is located at 1120 Ritchie Street, Clarksdale, Mississippi, 38614.

87. Magnolia Management is located at 762 Avery Boulevard North, Ridgeland, Mississippi, 39157, and can be served by its registered agent, CT Corporation, 625 Lakeland Drive, Suite 101, Flowood, Mississippi, 39232.

88. Forest Hill Nursing Center is located at 927 Cooper Road, Jackson, Mississippi, 39212, and can be served by its registered agent, Hugh C. Franklin, 14 Northtown Drive #202, Jackson, Mississippi, 39211.

89. A.D. Buffington is a resident of Rankin County, Mississippi, and can be served at 1007 Country Place Drive, Pearl, Mississippi, 39208, and is an officer and/or owner of Forest Hill Nursing Center.

90. Hillcrest Nursing Center is a Limited Liability Company, and can be served by its registered agent, Steve Delaney, 14 Northtown Drive, Suite 202, Jackson, Mississippi, 39211.

91. The Myrtles Health Care Facilities can be served by its registered agent, Gary D. Thrash, 600 East Amite Street, Jackson, Mississippi, 39201.

92. Legacy Health Care Services, Inc. is located at 571 Highway 51, Suite A, Ridgeland, Mississippi 39157 and can be served by its registered agent, H.K. Beebe, Jr., 229 Calumet Drive,

Madison, Mississippi, 39110.

93. Arnold Avenue Nursing Home is located at 402 Arnold Avenue, Greenville, Mississippi, and can be served by its registered agent, A.D. Felts, 205 East Starling Street, Greenville, Mississippi, 38701.

94. Richard T. Daspit is an adult resident of Baton Rouge, Louisiana and can be served at 17617 South Harrell's Ferry Road, Baton Rouge, Louisiana, 70816, and is an officer and/or owner of Arnold Avenue Nursing Home, Autumn Leaves Nursing Home, Haven Hall Healthcare Center, Pemberton Manor, and Foundation Health Services.

95. Foundation Health Services is a Louisiana Corporation located at 17617 South Harrell's Ferry Road, Baton Rouge, Louisiana, and can be served by its registered agent, Richard T. Daspit, Sr., 17617 South Harrell's Ferry Road, Baton Rouge, Louisiana, 70816.

96. Premier Marketing Associates is a Louisiana Corporation located at 714 North Ashley Ridge Loop, Shreveport, Louisiana, 71106, and can be served by its registered agent, Charles D. Gray, 714 North Ashley Ridge Loop, Shreveport, Louisiana, 71106.

97. Autumn Leaves Nursing Home is located at 570 North Solomon Street, Greenville, Mississippi, 38701, and can be served through its registered agent, Stanley O. Ingram, 570 North Solomon Street, Greenville, Mississippi, 38703.

98. Haven Hall Healthcare Center is located at 101 Mill Street, Brookhaven, Mississippi, 39601.

99. Pemberton Manor, Inc. can be served by its registered agent, Marion M. Moor, West Claiborne Extended, Greenwood, Mississippi.

100. Briar Crest Extended Care is located at 16056 Boundary Drive, Ashland,

Mississippi, 38603.

101. Vanguard Healthcare Management Services is located at 6 Cadillac Drive, #310, Brentwood, Tennessee, 37027, and can be served by its registered agent, Kirk Herbert, 6 Cadillac Drive, #310, Brentwood, Tennessee, 37027.

102. William Orand is the CEO of Vanguard Healthcare Management Services and the CEO of Total Ancillary Services.

103. Richard Wagner is the President of Vanguard Healthcare Management Services and the President of Total Ancillary Services.

104. Kirk Herbert is an officer and/or owner of Vanguard Healthcare Management Services.

105. Jerry Ervin is the former Vice President of Vanguard Healthcare Management Services and the former Vice President of Total Ancillary Services.

106. Total Ancillary Services is located at Two International Plaza Drive #200, Nashville, Tennessee, 37214, and can be served by its registered agent, National Registered Agents, Inc., 840 Trustmark Building, 248 East Capitol Street, Jackson, Mississippi, 39201.

107. Rest Haven Nursing Home is located at 103 Cunningham Drive, Ripley, Mississippi, 38663.

108. Shady Lawn Nursing Home is located at 23 Porters Chapel Road, Vicksburg, Mississippi, 39180, and can be served by its registered agent, Ellis Bodron, 60 Shady Lawn Place, Vicksburg, Mississippi, 39180.

109. Vicksburg Convalescent is located at 1708 Cherry Street, Vicksburg, Mississippi.

110. Aurora Australis Lodge is located at 310 Emerald Drive, Columbus, Mississippi

39702, and can be served by its registered agent, CT Corporation System, 645 Lakeland Drive, Suite 101, Flowood, Mississippi, 39232.

111. The Nichols Center is located at 7521 Old Canton Road, Madison, Mississippi, 39110, and can be served by its registered agent, G. Michael Massey, 3003 Lakeland Cove #E, Jackson, Mississippi, 39236.

112. Larry Fortenberry is an adult resident of Mississippi, and can be served at 418 Center Street, Sumrall, Mississippi, 39482, and is an officer and/or owner of The Nichols Center, Vineyard Court Nursing Center, Willow Creek Retirement Center, Jones County Rest Home, The Carrington Nursing Center, Southern Healthcare Association, Formulated Health Care Services, and Medical Plus, LLC.

113. Larry Russell is an adult resident of Mississippi, and can be served at Route 1, Box 1254, Silver Creek, Mississippi, 39663, and is an officer and/or owner of The Nichols Center, Vineyard Court Nursing Center, Willow Creek Retirement Center, Jones County Rest Home, The Carrington Nursing Center, Southern Healthcare Association, and Medical Plus, LLC.

114. Southern Healthcare Association is located at 418 Center Street Sumrall, Mississippi, 39482, and can be served by its registered agent, G. Michael Massey, 3003 Lakeland Cove #E, Jackson, Mississippi, 39232.

115. Medical Plus is located at 418 Center Street, Sumrall, Mississippi, 39482, and can be served by its registered agent, G. Michael Massey, 3003 Lakeland Cove #E, Jackson, Mississippi, 39232.

116. Vineyard Court Nursing Center is located at 2002 5th Street, Columbus, Mississippi, 39702.